

Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com
Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com
EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148
Telephone: (702) 331-7593
Facsimile: (702) 331-1652

Kevin S. Sinclair, NV Bar No. 12277
ksinclair@sinclairbraun.com
SINCLAIR BRAUN LLP
16501 Ventura Blvd, Suite 400
Encino, California 91436
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

Attorneys for Defendants
FIDELITY NATIONAL TITLE GROUP, INC. CHICAGO
TITLE INSURANCE COMPANY and CHICAGO TITLE OF
NEVADA, INC.

**DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)**

Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HSBC BANK USA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00195-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTIONS TO DISMISS
(ECF Nos. 33, 34, 35)**

COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Chicago Title Insurance Company (“Chicago Title”) and Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively, “Defendants”) and plaintiff HSBC Bank USA, National Association (“HSBC”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On February 3, 2021, HSBC filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On February 3, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. On March 8, 2021, FNTG, Chicago Title, and Chicago Agency moved to dismiss
6 HSBC's complaint. (ECF Nos. 11-13);

7 4. On May 24, 2021, HSBC filed its opposition to FNTG's motion to dismiss (ECF
8 No. 33), Chicago Agency's motion to dismiss (ECF No. 34) and Chicago Title's motion to
9 dismiss (ECF No. 35). HSBC also filed a countermotion for partial summary judgment in
10 response to Chicago Title's motion to dismiss. (ECF No. 36);

11 5. Defendants' respective replies supporting their motions to dismiss are due on May
12 31, 2021, while Chicago Title's response to HSBC's countermotion for partial summary judgment
13 is due on June 14, 2021;

14 6. Counsel for Defendants are requesting a two-week extension of their deadline to
15 file their respective replies supporting their motions to dismiss, through and including June 14,
16 2021, (such that FNTG's reply, Chicago Agency's reply, Chicago Title's reply, and Chicago
17 Title's opposition to the countermotion are all due on June 14, 2021) to afford Defendants'
18 counsel additional time to review and respond to HSBC's various oppositions.

19 7. Counsel for HSBC does not oppose the requested extension;

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 8. This is the first request for an extension made by counsel for Defendants, which is
2 made in good faith and not for the purposes of delay.

3 **IT IS SO STIPULATED** that Defendants deadline to file their respective replies to their
4 motions to dismiss are hereby extended through and including June 14, 2021.

5 Dated: May 25, 2021

SINCLAIR BRAUN LLP

6
7 By: /s/-Kevin S. Sinclair

8 KEVIN S. SINCLAIR
9 Attorneys for Defendants
10 FIDELITY NATIONAL TITLE GROUP,
11 INC., CHICAGO TITLE INSURANCE
12 COMPANY, AND CHICAGO TITLE OF
13 NEVADA, INC.

14 Dated: May 25, 2021

15 WRIGHT, FINLAY & ZAK, LLP

16 By: /s/-Christina V. Miller

17 CHRISTINA V. MILLER
18 Attorneys for Plaintiff
19 HSBC BANK USA, NATIONAL
20 ASSOCIATION

21 **IT IS SO ORDERED.**

22 Dated this 28th day of May, 2021.

23 
24 RICHARD F. BOULWARE
25 UNITED STATES DISTRICT JUDGE